## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Aswad N. Jones : CASE NO. 1:16-bk-00225 RNO

a/k/a Oz N. Jones

Debtor

CHAPTER 13

U.S. Bank NA, successor Trustee to Bank:
of America, NA successor in interest to:
LaSalle Bank NA, on behalf of the:
registered holders of Bear Stearns Asset:
Backed Securities I Trust 2006-H8,:

Asset-Backed Certificates, Series

2006-HE8

:

Movant

:

**v.** 

:

Aswad N. Jones : a/k/a Oz N. Jones :

Charles J. DeHart, III (Trustee) :

Respondents :

## DEBTORS' RESPONSE TO MOTION OF U.S. BANK NA, SUCCESSOR TRUSTEE TO BANK OF AMERICA, NA, SUCCESSOR IN INTEREST TO LASALLE BANK NA, ON BEHALF OF THE REGISTERED HOLDERS OF BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2006-HE8, ASSET-BACKED CERTIFICATES, SERIES 2006-HE8 FOR RELIEF FROM THE AUTOMATIC STAY

**AND NOW,** come Debtor, Aswad N. Jones, by and through his attorney, Gary J. Imblum, and respectfully respond as follows:

- 1. Admitted in part and denied in part. The Debtor has no knowledge. Strict proof is demanded.
  - 2. Admitted.
  - 3. Admitted.
  - 4. Admitted in part and denied in part. Debtor has no knowledge of the assignment of

the mortgage. Strict proof is demanded.

- 5. Admitted in part and denied in part. Debtor has no knowledge of the servicer. Strict proof is demanded.
  - 6. Admitted.
- 7. Admitted. Debtor will make an offer in the near future to bring the post petition arrears current.
  - 8. Admitted in part and denied in part. See response to paragraph 7.
- Denied. The amount owed on the mortgage exceeds the fair market value of the real estate. Accordingly, no attorney fees and costs may be charged in relation to this matter.
  - 10. Admitted in part and denied in part. See response to paragraph 9.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,

Gary J. Imblum

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Desc

Attorney for Debtors

DATED: 6/19/17

## **CERTIFICATION OF SERVICE**

I, Bernadette A. Davis, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF U.S. BANK NA, SUCCESSOR TRUSTEE TO BANK OF AMERICA, NA, SUCCESSOR IN INTEREST TO LASALLE BANK NA, ON BEHALF OF THE REGISTERED HOLDERS OF BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2006-HE8, ASSET-BACKED CERTIFICATES, SERIES 2006-HE8 FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE CHAPTER 13 TRUSTEE VIA E-SERVICE dehartstaff@pamd13trustee.com

JAMES C. WARMBRODT, ESQUIRE COUNSEL FOR MOVANT VIA E-SERVICE

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For Debtors

DATED: \$129119